

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**JOINT STIPULATED MOTION  
TO EXTEND DEADLINES**

COME NOW Plaintiffs Jane Doe 1 and Jane Doe 2, and Defendant by and through their respective undersigned counsel, and request that the following deadlines be extended:

1. The deadlines for identifying and providing complete expert disclosures for all experts expected to testify at trial, (both retained experts, (Fed. R. Civ. P. 26(a)(2)(B)), and non-retained experts, (Fed. R. Civ. P. 26(a)(2)(C)), be extended from June 30, 2023, to **September 28, 2023**, for the defendant(s).

2. Deadline for completing written discovery under Rules 33, 34, 36 and 45 of the Federal Rules of Civil Procedure be extended from July 30, 2023, to **October 27, 2023**. Deadline to file motions to compel written discovery under Rules 33, 34, 36 and 45 be extended from August 30, 2023, to **November 28, 2023**.

3. The deposition deadline, including but not limited to depositions for oral testimony only under Rule 45 be extended from September 30, 2023, to **December 15, 2023**.

4. The deadline for filing motions to dismiss and motions for summary judgment be extended from January 31, 2024, to **February 28, 2024**.

5. The deadline for filing motions to exclude testimony on Daubert and related grounds be extended from September 30, 2023, to **April 30, 2024**.

6. The parties are working diligently to comply with all of the Court deadlines. The parties have been and continue to be actively engaged with written discovery. The

extension of the above deadlines will allow the parties sufficient time to discover the facts at issue in this case. The enlargement of time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court extend the above deadline as requested herein.

DATED this 30th day of June, 2023.

JANE DOE 1 AND JANE DOE 2, Plaintiffs

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

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